

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JUE ZHANG,

Plaintiff,

v.

SHRAGA N. GOLDBERG, M.D.,

Defendants.

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) C.A. NO. 04-12735PBS
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**MOTION OF THE DEFENDANT, SHRAGA N. GOLDBERG, M.D.,
TO MOVE THE HEARING 5 DAYS FROM OCTOBER 25 TO OCTOBER 30, 2006
ASSENTED-TO BY THE PLAINTIFF**

The Defendant, Shraga N. Goldberg (“Dr. Goldberg”), respectfully requests that this Court MOVE the Hearing on the Motion to Obtain Documents for the United States Government from October 25, 2006 until **October 30, 2006**, to which the plaintiff assents. In support thereof, the defendant states the following:

1. When the Court set the date at the Hearing last week, defense counsel forgot that she has vacation planned in California for that week.
2. Defense counsel called plaintiff’s counsel immediately upon realizing the error and was able to come to an agreement on the date of October 30, 2006 (for which the Court was available).
3. The **plaintiff’s counsel has assented to** this motion.

Wherefore, the parties request that the Motion Hearing be rescheduled for October 30, 2006.

The Defendant,
SHRAGA N. GOLDBERG, M.D.,
By his attorney,

The Plaintiff,
JUE ZHANG,
By her Attorneys,

/s/ Jennifer Boyd Herlihy
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